

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JANET P. GRAF, individually, and derivatively on
behalf of Taylor Lumber Holdings, Inc.,

Plaintiff,

v.

RESILIENCE CAPITAL PARTNERS, LLC, *et al.*,

Defendants.

Civil Action No. 1:12-cv-2278

Hon. Dan Aaron Polster

LITIGATION SCHEDULE

1. Following the parties' teleconference with the Court on August 8, 2013, pursuant to which the Court ordered the parties to submit a proposed litigation schedule, counsel for the parties conferred by e-mail regarding the following litigation schedule.

2. The parties exchanged initial disclosures on or before November 28, 2012.

3. The parties recommend that the case be assigned to the Court's standard track.

4. The parties believe that this case is suitable for mediation after discovery is completed.

5. The parties do not consent to the jurisdiction of the United States Magistrate pursuant to 28 U.S.C. § 636(c).

6. The parties agree that this case involves electronic discovery. Plaintiff, however, does not have or maintain any electronically stored information related to this case.

7. Recommended Discovery Plan

(a) The parties agree that electronically stored information will be exchanged in native format.

(b) The parties do not anticipate any issues with electronic discovery, but reserve the right to raise objections related to the production of electronic discovery in the future. In addition, Plaintiff does not possess or maintain any electronically stored information. All documents and information in Plaintiff's possession and/or control are in hard copy form.

(c) The parties recommend that Plaintiff serve an expert witness report on December 13, 2013, and that Defendants serve rebuttal expert witness reports on January 10, 2014.

(d) The parties recommend February 14, 2014 as the deadline for fact discovery.

8. The parties recommend March 14, 2014 as the deadline for filing dispositive motions.

9. The parties recommend October 11, 2013 as the deadline for amending the pleadings and/or adding additional parties.

10. The parties recommend March 3, 2014 as the date for a status hearing and/or final pretrial settlement conference. Settlement Conference set for March 3, 2014 at 9:00 AM. Each party shall fax a settlement position paper to the Court by 12:00 PM on April 27, 2014. The fax number is 216-357-7195

Schedule adopted. /s/Dan Aaron Polster 8/16/13